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6
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,
Plaintiff,

10 vs.

11 DAVID STEPHEN BANGS II,
Defendant.

CASE NO.: 2:20-CR-00006-001-GMN-NJK
STIPULATION TO CONTINUE TIME FOR
SENTENCING

12
13 **STIPULATION TO CONTINUE TIME FOR SENTENCING**

14 IT IS HEREBY STIPULATED AND AGREED by and between Jeremy Stanton Robbins,
15 Special Assistant United States Attorney, Counsel for UNITED STATES OF AMERICA, and
16 Maysoun Fletcher, Esq., Counsel for Defendant DAVID STEPHEN BANGS II, that the Sentencing
17 Hearing currently scheduled for May 26, 2020 at 4:00 p.m. be vacated and reset to July 8, 2020 at
18 10:00 a.m.

19
20 This Stipulation is entered into for the following reasons:

21 1. In-Person Sentencing Hearing appearances are currently limited due to the Covid-19
22 pandemic. The Court's next available in -person hearing is May 27, 2020, however, Counsel for the
23 United States is unavailable on that date.

24 2. Counsel for the United States must travel from another State for the hearing and will
25 need time to make travel arrangements once the Court has resumed in person appearances.

26 3. Mr. Bangs is out of custody on pre-trial release and has no objection to the request for
27 continuance, after speaking with his counsel.
28

1 4. Counsel for the United States has no objection to the continuance.

2 5. Denial of this request for continuance could result in a miscarriage of justice.

3 6. The additional time requested by this stipulation is excludable in computing the time
4 within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States
5 Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering
6 the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).
7

8 7. For all the above-stated reasons, the ends of justice would best be served by a
9 continuance of the current Sentencing Hearing.

10 This is the first request for continuance filed herein.

11 DATED: May 19, 2020.

12
13 /s/ Jeremy Stanton Robbins
14 **Jeremy Stanton Robbins, Esq.**
15 Special Assistant United States Attorney
16 400 South Virginia Street
17 Reno, Nevada 89501

/s/ Maysoun Fletcher
 Maysoun Fletcher, Esq.
 5510 South Fort Apache Road
 Las Vegas, Nevada 89148
 Attorney for Defendant, David Bangs, II.

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9 UNITED STATES OF AMERICA,
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13 **FINDINGS OF FACT**

14 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court
15 finds:

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18 pandemic. The Court's next available in -person hearing is May 27, 2020, however, Counsel for the
19 United States is unavailable on that date.

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21 need time to make travel arrangements once the Court has resumed in person appearances.

22 3. Mr. Bangs is out of custody on pre-trial release and has no objection to the request for
23 continuance, after speaking with his counsel.


24 4. Counsel for the United States has no objection to the continuance.

25 5. Denial of this request for continuance could result in a miscarriage of justice.
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8 CONCLUSIONS OF LAW

0 || **ORDER**

14 IT IS SO ORDERED.


HONORABLE GLORIA M. NAVARRO
U.S. DISTRICT COURT JUDGE